

Col Redington

28 Oct. 44

(1)

Letter of 4th December, 44
for 28th Oct - 3rd Nov. 44

28 OCTOBER 1947

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Tuesday, 28 October 1947

INTERNATIONAL MILITARY TRIBUNAL
FOR THE FAR EAST
Court House of the Tribunal
War Ministry Building
Tokyo, Japan

The Tribunal met, pursuant to adjournment,
at 0930.

Appearances:

For the Tribunal, all Members sitting,
with the exception of: HONORABLE JUSTICE R. B. PAL,
Member from India, not sitting from 0930 to 1600.

For the Prosecution Section, same as before.

For the Defense Section, same as before.

(English to Japanese and Japanese
to English interpretation was made by the
Language Section, IMTFE.)

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1 MARSHAL OF THE COURT: The International
2 Military Tribunal for the Far East is now in session.

3 THE PRESIDENT: All the accused are present
4 except SHIRATORI and TOGO, who are represented by
5 counsel. The prison surgeon at Sugamo certifies that
6 SHIRATORI is too ill to attend the trial today. The
7 certificate will be recorded and filed.

8 With the Tribunal's permission the accused
9 TOGO will be absent from the courtroom for the whole
10 of the morning session conferring with his counsel.

11 Major Blakeney.

12 - - -

13 R O K U Z O T A K E B E, called as a witness on
14 behalf of the prosecution, resumed the stand
15 and testified as follows:

16 CROSS-EXAMINATION

17 BY MR. BLAKENEY (Continued):

18 Q I want to ask you a few questions about the
19 National Service Law of 1939, which is mentioned in
20 your original affidavit on page 4.

21 The purpose of this law was to raise and train
22 a national Manchukuan army, wasn't it?

23 A I shall reply. The National Service Law was
24 enacted in 1939, whereas I didn't assume my post as
25 Director of the General Affairs Board of Manchukuo

1 until 1940, so I am not familiar with the circumstances
2 in which this law was first enacted. The Manchurian
3 national army was under the Kwantung Army, and the
4 commander of the Kwantung Army had the power of com-
5 manding that army.

6 Q I asked you about the purpose of the National
7 Service Law of 1939. If you can answer it please do so.

8 A The National Service Law was enacted for the
9 purpose of conscripting Manchukuan in order to in-
10 crease the strength of the Manchurian national army.

11 Correction: The National Service Law was a
12 law enacted for the purpose of conscripting necessary --
13 conscripting the strength required by the Manchurian
14 national army.

15 Q What was the strength required every year?

16 A Although I don't know the exact number, I
17 believe it was somewhere around 25,000.

18 Q What was the full number of men in the Man-
19 chukuo national army?

20 A I believe it was around 70- to 80,000.

21 Q What was the period of service provided for
22 the conscripts under the National Service Law?

23 A My recollection is that it was three years.

24 Q That is right. So in three years the entire
25 soldier personnel of the army was turned over or

changed, wasn't it?

1 A Yes.

2 Q By the way, do you know that, as a matter of
3 fact, although the theoretical term of service was
4 three years, the period of actual active service was
5 somewhat shorter?

6 A No, I didn't know that.

7 Q Did the National Service Law provide for
8 inactive or reserve service by the conscripts after
9 the expiration of their three-year term of active duty?
10

11 A At the time there was none.

12 Q Now, you mentioned the question of the supreme
13 command of the Manchukuan army. It is a fact, isn't
14 it, that under the provisions of that law, in peacetime
15 the supreme command of the Manchukuo national army
16 was in the Emperor of Manchukuo?

17 A From what I have heard the Emperor of Manchukuo
18 did not have the power of the supreme command. That
19 prerogative belonged to the commander of the Kwantung
20 Army.

21 Q Where did you hear that?

22 A There was a secret treaty concluded between
23 Manchukuo and Japan whereby the Emperor of Manchukuo
24 delegated the power of the supreme command to the
25 commander of the Kwantung Army.

Q What was the date of that treaty?

1 A I don't know the date of the signing of this
2 treaty, but I believe it was in the early days of the
3 founding of Manchukuo.

4 Q When did you see the treaty?

5 A I have never seen the original of the treaty
6 itself, but I have heard about it.

7 Q Did you see a copy?

8 A No.

9 Q Who told you the contents of the treaty?

10 A The first time I heard of this treaty was when
11 I had been appointed -- it was just after my appoint-
12 ment as Chief of the General Affairs Board of Manchukuo.
13 I called on Mr. YANAI at the Foreign Office and heard
14 all this from him.

15 Q What did YANAI, Tsuneo tell you about it?

16 A He told me that there were a number of secret
17 treaties, but among them was this one whereby the
18 Emperor of Manchukuo delegated his power of the supreme
19 command to the commander of the Kwantung Army.

20 Q Did you get the impression that it was a sepa-
21 rate treaty dealing with the one subject of the supreme
22 command of the Manchukuan army?

23 COLONEL IVANOV: Your Honor, in my submission,
24 the question of the impressions of the witness has no
25 bearing upon the issues and will not interest the

Tribunal.

1 THE PRESIDENT: By asking him his impressions
2 you are only asking him what he thought.

3 The objection is overruled.

4 THE INTERPRETER: The witness started to say,
5 "I shall reply."

6 I gained the impression that this was a separ-
7 ate agreement concluded between Chief Executive Pu-Yi
8 and General HONJO, commander of the Kwantung Army.
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1 Q What were you told about whether that treaty
2 provided that the Supreme Command of the Manchukuo Army
3 in peacetime was under the Emperor?

4 A I didn't hear anything about that.

5 Q After the passage of the National Service Law
6 in 1939, did the strength, the numerical strength, of the
7 Manchukuo National Army increase?

8 A I am not aware of the circumstances around that
9 time.

10 Q Around what time?

11 A Just before and after the passage of the Nation
12 al Service Law.

13 Q Well, it was your duty, was it not, as Chief
14 of the General Affairs of Manchukuo to enforce that law?

15 A The Manchukuo Government did cooperate in the
16 matter of conscripting the recruits.

17 Q Didn't the Manchukuo Government keep the record
18 showing what the strength of the army was at various
19 times, both before and after the passage of this law?

20 A Of course I don't know, but I believe that the
21 strength of the army was known from year to year.

22 Q What about the budget for military expenditures
23 Did it show an increase or a decrease or did it stay the
24 same after the passage of that law?

25 A The military -- budget for military

1 expenditures showed some increase from year to year.

2 Q How much is "some increase"?

3 A I am afraid I don't remember the extent of the
4 increase.

5 Q But you are quite sure there was an increase
6 over 1938 in 1939 and subsequent years?

7 A Yes, I do know that.

8 Q Prices and other things in general rose during
9 those years too, did they not?

10 A I believe they did.

11 Q Well, now, Mr. Witness, to shorten this, don't
12 you know for a fact that the passage of the National
13 Service Law in 1939 did not contemplate nor import any
14 increase in the size of the armed forces of the Man-
15 chukuo Government, but represented merely an effort to
16 consolidate and rationalize the pre-existing military
17 forces of and in the country?

18 COLONEL IVANOV: If your Honor please, the wit-
19 ness has already replied that in 1939 he was not in
20 Manchuria, and the information that he has already given
21 to the questions asked by the defense do cover the
22 matter.

23 MR. BLAKENEY: I don't think this witness re-
24 quires any assistance whatever from counsel.

25 THE PRESIDENT: He did profess to have some

1 knowledge; he could not give figures, though. He is in
2 a position where he should know what the budget expend-
3 iture was, and that would be involved.

4 The question is allowed.

5 A May I have the question repeated, please?

6 (Whereupon, the last question was
7 read by the Japanese court reporter.)

8 A (Continuing) Before the passage of the National
9 Service Law, I believe the Manchurian National Army was
10 -- the strength of the Manchurian National Army was
11 recruited early by voluntary enlistment. By the
12 passage of the National Service Law, young men who had
13 reached a certain age were compulsorily recruited --
14 conscripted. This law therefore had the purpose of
15 strengthening the Manchurian National Army.

16 I shall continue:

17 Therefore, the purpose of this law was to
18 strengthen the Manchurian National Army, but I do not
19 know as a matter of fact just whether or how much the
20 Manchurian National Army actually increased around the
21 year 1940.

22 THE INTERPRETER: Correction on the previous
23 statement: "Since 1940" instead of "after 1940!"

24 The witness continued:

25 A The greatest increase in the strength of the

1 Manchurian Army was in 1943 or 1944, I forgot which.
2 Around those years a plan for increasing the annual
3 strength of the Manchurian National Army to 40,000 or
4 45,000 was begun.

5 Q Increasing it to or by 40,000?

6 A The plan was to conscript 40 to 45,000 a year.
7 Therefore, in three years, the army would be well over
8 100,000.

9 Q What was the actual strength of the Manchukuo
10 Army by the beginning of the year 1945?

11 A Although I don't know for sure, I believe it
12 was somewhere between 80-and 90,000.

13 Q Do you know how much the strength of the Kwan-
14 tung Army had been decreased by that time?

15 A That I do not know.

16 Q Do you know what the strength of all forces in
17 Siberia was at that time?

18 A I do not know.

19 Q And yet you state in your affidavit, don't you,
20 that the reason for the National Service Law was to have
21 a large army for a war against the USSR? Do you really
22 think this Manchukuo National Army of 80 to 90,000 was
23 there to wage war against the USSR?

24 THE PRESIDENT: That is really a matter for
25 comment. His answer won't help.

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1 MR. BLAKENEY: All right, we will pass that.

2 Q So, as you understand it, the purpose of the
3 National Service Law was to improve the quality of
4 the personnel of the Manchukuo National Army; do I
5 understand you correctly?

6 A One of the purposes, I suppose, was to
7 improve the caliber of the soldiers in the Manchurian
8 National Army, but the purpose for improving the
9 caliber was because a future increase in the total
10 strength of the Manchurian National Army was envisaged.

11 Q Who told you that?

12 A I was not in Manchukuo in 1939 when the law
13 was passed so what I am going to say is not the
14 result of my own personal observation but that is
15 what I felt. I do not know from my own personal
16 knowledge but what I just told you was my own obser-
17 vation.

18 THE PRESIDENT: In those circumstances his
19 answer as he gives it will not be very helpful to us.
20 He was not even a soldier.

21 Q Mr. Witness, you have stated quite a few
22 times that since you were not in Manchuria in the
23 years immediately preceding 1940 you are not able to
24 give factual answers in connection with matters
25 occurring at that time. What I would like to know,

1 if that is so, is how you know what your predecessor
2 in your post there was doing up to 1940, as you
3 testify on page 4 of your errata affidavit, and how
4 you know what the chiefs of staff of the Kwantung
5 Army were doing during the years that you were not
6 there, as you testify on the same page?

7 A To begin with, there were many orders
8 addressed to my predecessors from the Kwantung Army
9 which were in document form. I was able to learn
10 of what he was doing from these.

11 Q Then, everything of that nature that you do
12 know is something you learned from documents or from
13 hearsay, is that so?

14 A Yes.

15 Q And when you talk about what those people,
16 whom I have mentioned, endeavored to do, you are just
17 giving your opinion, pure and simple, aren't you?

18 A Whom do you mean by these people? May I
19 have that repeated?

20 THE PRESIDENT: We have enough information
21 from him already to know on what he based those two
22 last paragraphs.

23 On behalf of a Member of the Tribunal, I
24 would like the witness to tell us what is the differ-
25 ence between an offensive stand--

1 In your affidavit you make the following
2 statement: "Until the Nomonhan Incident the Kwantung
3 Army had taken an offensive stand towards the USSR,
4 but after the above Incident, it changed to an atti-
5 tude of aggressive defense." Will you please tell us
6 the difference between an offensive stand and an atti-
7 tude of aggressive defense?

8 THE WITNESS: I shall reply. Since I am
9 neither an army man nor a military expert I am not
10 fully conversant with military terms; however, it
11 was my understanding that until the Nomonhan Incident
12 the Kwantung Army was ready, should a positive oppor-
13 tunity present itself, to take the offensive against
14 the Soviet Union.

15 I became chief of the General Affairs Board
16 of Manchukuo the year after the Nomonhan Incident.
17 I think I can safely say that Japan suffered heavy
18 losses in the Nomonhan Incident.

19 THE MONITOR: Went through bitter experience.

20 THE WITNESS (Continuing): The year after the
21 Nomonhan Incident I went to Manchukuo to serve under
22 General UMEZU and from UMEZU's attitude and expression
23 and various talks which he made I gathered that, while
24 he was prepared to take the offensive, the position
25 taken by him was mainly that of defense.

1 I am afraid my explanation may become
2 somewhat lengthy, but I should like to be permitted
3 to add an explanation.

4 As I said yesterday in 1941 when the Kanto-
5 kuen, the Kwantung Army special maneuver, was com-
6 menced, I was afraid that war with Soviet Russia was
7 imminent; and in August of the same year I went to
8 Tokyo and met General TOJO and was there assured that
9 war would not break out immediately. I learned of the
10 Kantokuen in July, 1941, and I went to Tokyo in
11 August.

12 TOJO told me that the Manchukuoan Government
13 should cooperate with the Kwantung Army in carrying
14 out the Kantokuen, but he did not tell me the real
15 purpose of the Kantokuen itself. Even after my
16 return to Manchukuo, Commander UMEZU did not offer
17 me any special explanation. Therefore, I was forced
18 into the position of arriving at my own conclusions
19 regarding the purpose of the Kantokuen.

20 As regards what I learned of the Kantokuen,
21 as I told you yesterday, since I am not a military man
22 I did not know anything about the operational plans
23 involved in that plan. All I was able to learn was
24 by the demands which the Kwantung Army made to the
25 Manchukuo Government in connection with that plan.

1 For instance, since the strength of the Kwantung Army
2 was increased, new barracks were required, more food
3 must be provided; also the Kwantung Army, in order to
4 carry out its operational plans, must have railways,
5 it must have roads, it must have airfields.

6 THE PRESIDENT: I think that we cannot hope
7 to gain any further information on this point that
8 will really be helpful.

9 THE WITNESS: May I continue my explanation?

10 THE PRESIDENT: No, the particular Member
11 of the Court who asked you the question does not want
12 to hear you further.

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1 Q Now, in your testimony you speak of the
2 Fifth Section of the Kwantung Army Staff. What were
3 the functions of the Fifth Section of the Kwantung
4 Army Staff?

5 A The activities of the Fifth Section of the
6 Kwantung Army were kept very secret, and, therefore,
7 I have never heard directly from anyone in the Kwan-
8 tung Army about what was being done in that section.
9 But, as a matter of fact, there were some younger
10 officials of the Manchukuoan Government who were
11 helping in the research -- in the investigations being
12 carried on by the Fifth Section. And, because of
13 this, generally speaking, I was able to get the
14 general picture of what the Fifth Section was doing.
15 I heard from FURUKI, who was Vice-Director of the
16 General Affairs Board, that the Fifth Section was
17 concerned with matters such as the administration of
18 occupied areas, the problems of banking, propaganda,
19 and so forth in those occupied areas.

20 Q Is that all you heard about the functions of
21 the Fifth Section?

22 A That is all I know about the Fifth Section.

23 Q What other functions it may have had you do
24 not know.

25 A I don't know.

1 Q And when you state that it was engaged in
2 studying occupational system for the territories of
3 the Soviet Union, do you know whether it was also
4 engaged in studying the questions of military govern-
5 ment for territories other than those of the Soviet
6 Union?

7 A I didn't know of that.

8 Q You say that this Fifth Section was organ-
9 ized in the summer -- no, I am sorry: in 1941.

10 A That is my recollection.

11 Q And how long did it continue to exist, until
12 the end of the war?

13 A I don't believe it continued quite that
14 long.

15 Q Well, until when do you think it continued?

16 A I don't remember for sure, but I believe by
17 1943 it had already been dissolved.

18 Q Were you told by the young officials of the
19 Manchukuo Government why it was dissolved?

20 A No.

21 Q Were these young officials of the Manchukuo
22 Government the leading officials whom you mention
23 in your affidavit?

24 A By "leading Japanese officials" I meant out-
25 standing officials who were a little more than young.

1 Q I see. Now, you have a good deal to say in
2 your affidavit about the Kyowakai, and you mention
3 in connection with it Lieutenant General LIYAKE.
4 What was his position in the Kyowakai?

5 A General LIYAKE was Chief of the Central
6 Headquarters of the Kyowakai.

7 Q From what date?

8 A According to my recollection, it was from
9 the end -- around the end of 1940.

10 Q Do you know who selected him for appointment
11 to that position?

12 A I think it was the Kwantung Army.

13 Q Why do you think so?

14 A The Kwantung Army had, from before, di-
15 rected the activities -- had from before controlled
16 the Japanese officials in the Kyowakai.

17 Q Now, you know as a matter of fact that
18 General LIYAKE was selected by the Prime Minister of
19 Manchukuo, who was also President of the Kyowakai,
20 don't you?

21 A The President of the Kyowakai was the Prime
22 Minister of Manchukuo, and as far as form went the
23 Chief of the Central Headquarters was appointed by
24 the President of the society. However, in actuality,
25 Prime Minister Chang had no voice in the selection of

1 officers, and it is natural that the commander of the
2 Kwantung Army had the final say in selecting the
3 Chief of the Central Headquarters.

4 Q Well, now, let's just leave out of the ques-
5 tion what is natural, and you tell me whether you
6 don't know as a fact that Prime Minister Chang Ching-
7 hui made the selection of General LIYAKE for this
8 position in December, 1940.

9 COLONEL IVANOV: If your Honor please, the
10 witness has already replied in substance to this
11 question exposing the technique of the Japanese ad-
12 ministration in Manchuria. The prosecution objects
13 to a new question though this reply may not suit my
14 learned colleague.

15 THE PRESIDENT: Let him answer.

16 A I shall do so. Well, of course, it is Chang
17 Ching-hui who actually appoints the chief of the
18 Central 'Quarters. But, in reality, I think it is
19 closer to the truth to say that the chief of the
20 Central Headquarters was appointed by the commander
21 of the Kwantung Army.

22 Q Well, I think you're playing on words. You
23 know the difference between select and appoint. Now,
24 is your answer, no, he was not selected by the Prime
25 Minister of Manchukuo?

1 THE PRESIDENT: He has already said in
2 effect that he was not selected by the Prime Minister.
3 His appointment was really nominal or as a matter of
4 course as far as the Prime Minister was concerned.
5 I think we have all come to the conclusion we are
6 not likely to get much assistance from any further
7 cross-examination along these lines, Major Blakeney.

8 Q Mr. witness, what were the purposes and
9 what was the object of the Kyowakai?

10 A Well, since I was not in Manchukuo at the
11 time of the founding of the Kyowakai, I can't tell
12 you of the purpose for which the society was founded.
13 The real, final objective of the Kyowakai was to im-
14 plant the Japanese spirit, the so-called spirit of
15 Japan, in the hearts of the peoples inhabiting
16 Manchukuo.
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- 1 Q Were you an official of the Kyowakai?
- 2 A Yes.
- 3 Q What office did you hold in it?
- 4 A I was a member of the Central Headquarters
- 5 Committee.
- 6 Q During the entire period of your service?
- 7 A Yes.
- 8 Q What was the membership of the Kyowakai during
- 9 those years?
- 10 A Well, it was stated that there were over four
- 11 million, but as a matter of fact I think that the
- 12 actual membership was very difficult to ascertain.
- 13 Q By the way, do you know where General MIYAKE
- 14 is now?
- 15 A I believe he is in Soviet Russia. I learned
- 16 of that through reading a Russian newspaper.
- 17 Q Recently?
- 18 A No, it was quite some time ago.
- 19 Q About how long ago?
- 20 A I don't recall for sure, but it must have
- 21 been at least over half a year.
- 22 Q Have you seen him during the time you have
- 23 been interned in the U.S.S.R.?
- 24 A No.
- 25 Q Can you read Russian?

A No.

1 Q What sort of newspaper did you read about him
2 in?

3 A Among those who are interned together with
4 me are many who can read and understand Russian. Those
5 people read the newspaper to me.

6 Q What was the information about General MIYAKE
7 something over half a year ago?

8 THE PRESIDENT: What is the point of that
9 question, Major Blakeney? I could understand you
10 wanting to find out his whereabouts, you might want
11 to subpoena him.

12 MR. BLAKENEY: If the Tribunal please, I
13 would rather not state the point in the presence of
14 this witness.

15 THE PRESIDENT: What point is there in asking
16 what was read to him from a Russian paper?

17 MR. BLAKENEY: I have a point which I think
18 very valid but which I would rather not state in the
19 presence of the witness. And I request prosecution
20 counsel not to state it for me in the presence of the
21 witness.

22 COLONEL IVANOV: Your Honor, at this stage
23 of the trial this is a question that will by no means
24 interest the Tribunal. But if Mr. Blakeney is
25

1 interested in this question he may clear it up in the
2 course of his work with the witness when he becomes a
3 defense witness.

4 THE PRESIDENT: Well, counsel must convince
5 us, of course, that his question is relevant and
6 material. We can't allow counsel to say: "Well, I
7 can't tell you. Let me ask the question first." Unless
8 you tell me the reason for the question, or give me
9 some indication, I don't propose to allow it, unless
10 my colleagues think otherwise.

11 I am taking it is objected to. I think that
12 is the sum total of what Colonel Ivanov said.

13 MR. BLAKENEY: I thought the case was an
14 exact parallel to that arising a few days ago when the
15 prosecutor was told that he need not disclose his hand
16 to the witness.

17 THE PRESIDENT: This question hasn't arisen
18 before.

19 MR. BLAKENEY: Well, I will leave it.
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1 BY MR. BLAKENEY (Continued):

2 Q Was General MIYAKE at one time a staff officer
3 of the Kwantung Army?

4 A I think he was chief of staff.

5 Q At what time was that? Do you know?

6 A Around the time of the Manchurian Incident.

7 Q And he retired from active service and returned
8 to Japan a good many years ago, didn't he?

9 A I think that was so.

10 Q Do you know when he retired?

11 A I don't know.

12 Q After his retirement and return to Japan was
13 he an officer of the Kwantung Army at all?

14 A Are you asking me whether he ever subsequently
15 became an officer in the Kwantung Army?

16 Q Yes.

17 A I don't think he did.

18 Q In fact, he couldn't have, being retired, could
19 he?
20

21 A I know nothing of such matters.

22 Q At any rate, during the time that he was chief
23 of the Central Headquarters of the Kyowakai he wasn't
24 an officer attached to the Kwantung Army at all, was he?

25 A No, he wasn't.

Q Do you know that according to evidence before

1 this Tribunal General MIYAKE died on the 23rd of October,
2 1946?

3 A When did he die? May I have the date repeated?

4 THE PRESIDENT: Do you know whether he is dead
5 or not?

6 THE WITNESS: I do not know.

7 Q Now, at the time you took appointment as Chief
8 of General Affairs of the Government of Manchukuo, was
9 it your purpose to go to Manchuria to prepare for war
10 against the U.S.S.R.?

11 A No, I did not go to Manchukuo with war as my
12 objective.

13 Q And what was your purpose in accepting that
14 position and going to Manchuria?

15 A I have been to Manchukuo two times, one in 1935
16 and the second time in 1940. The first time I went
17 I was Chief of the Kwantung Bureau -- correction: the
18 first time I went there I was first Chief of the Policy
19 Section of the Kwantung Bureau and subsequently I
20 became Chief of the Kwantung Bureau, but that time I
21 was an official of the Japanese Government. The second
22 time I became Director of the General Affairs Board and
23 this position was that of an Manchukuoan official. To
24 which position does your question refer?
25

Q I said when you accepted the post of Chief of

1 General Affairs in Manchukuo.

2 A When I went to Manchukuo, Manchukuo had been
3 established for the purpose of cooperating with Japan
4 in establishing a new order and I felt that the big
5 purpose was to bring up Manchukuo so that it could
6 become a truly independent nation. Especially since
7 the Manchurian Incident Manchukuo was considered as
8 Japan's lifeline and I felt that it was indeed an
9 important task to defend Manchuria and to develop
10 Manchukuo as a sound and healthy state and it was with
11 that thought in mind that I accepted the post.

12 THE PRESIDENT: We will recess for fifteen
13 minutes.

14 (Whereupon, at 1045, a recess was
15 taken until 1100, after which the proceedings
16 were resumed as follows:)
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1 MARSHAL OF THE COURT: The International
2 Military Tribunal for the Far East is now resumed.

3 THE WITNESS: May I continue my reply?

4 This is in continuation of what I was saying
5 before the recess. As I said, Manchukuo was Japan's
6 lifeline and must be maintained at all costs, and also
7 Manchukuo was where the Kwantung Army was, which was
8 preparing for war against -- for operations against the
9 Soviet Union. Since I felt that there was great sig-
10 nificance in aiding this important task as Chief of
11 the General Affairs Board, when I was approached by
12 General UMEZU to assume this post I accepted.

13 BY MR. BLAKENEY (Continued):

14 Q Now, you said your purpose in going was to
15 help in building up Manchukuo into a sound and healthy
16 country, or words to that effect. Did the building up
17 of a sound and healthy country in Manchukuo not require
18 that conditions of the people of Manchukuo be improved?

19 A Yes.

20 Q In fact, the standard of living was raised
21 considerably during your tenure, was it not?

22 A I am of the opinion that conditions in Man-
23 chukuo improved from year to year.

24 Q Education became more widespread?

25 A The number of those receiving secondary

1 education increased considerably and universities
2 and other institutes of higher learning also in-
3 creased.

4 Q Sanitary conditions were improved?

5 A Yes, they were.

6 Q The condition of the farmers and of agri-
7 culture also improved?

8 A The quantity of agricultural products in-
9 creased from year to year, and I also believe that
10 the conditions of the farmers themselves improved
11 bit by bit.

12 Q The various social services for improvement
13 of the conditions of the poor and so forth were greatly
14 expanded, were they not?

15 A Yes, they were expanded.

16 Q Even to some extent medical facilities and
17 services were improved, weren't they?

18 A Medical facilities were greatly expanded and
19 improved.

20 Q You worked for those aims, did you not?

21 A Those were one of my objects.

22 Q You achieved results which you justly felt
23 pride in, didn't you?

24 A I do admit that during my tenure of office
25 conditions in Manchuria improved, but I have no

1 intention of boasting about my own achievements,
2 or taking pride in them.

3 Q But to you those purposes were more or less
4 important than the purpose of preparing for aggres-
5 sion against the USSR?

6 A The preparation for operations vis-a-vis
7 the Soviet Union and the improvement of conditions
8 in Manchukuo are both sides of the same medal, and
9 you cannot separate them.

10 Q In carrying out those objects which we have
11 been discussing, improving the status of the country
12 and of its residents, you were encouraged, were you
13 not, by the commanders-in-chief of the Kwantung Army
14 under whom you served?

15 A What do you mean by encouragement? I under-
16 stand now. Yes, I was encouraged and exhorted by the
17 Commander of the Kwantung Army.

18 Q Where have you been interned since you were
19 captured by the Soviet forces?

20 A I was first captured by the Soviet forces
21 in Hsinking, and then was in Chita for some time; and
22 then for a short period of time I was sent to
23 Khabarovsk. Recently I have been living on the
24 outskirts of Moscow until my return to Japan.

25 Q Have you been treated as a prisoner of war

1 during this period?

2 A I was treated as a civilian internee.

3 Q Was your treatment equivalent to that of
4 prisoners of war officers?

5 A Yes; of course, not exactly the same; that
6 is to say, we are not receiving any salary.

7 Q Have you been tried for any war crime or
8 offense against the USSR?

9 A No.

10 Q Have you been charged with any such crime
11 or offense?

12 A No.

13 Q Are you aware of having been under investi-
14 gation on any such charge -- charge or suspicion?

15 A I don't know.

16 Q Have you been imprisoned at any time during
17 your stay in Soviet custody?

18 A Yes, I have.

19 Q For how long a period?

20 A From January 25, 1945 to May 30 of the same
21 year; for about four months I was in the first prison
22 in Khabarovsk.

23 Q You don't mean 1945, of course?

24 A It was last year; so it should be 1946.

25 Q From January until May?

1 A Until May 30.

2 Q During that time your affidavit was taken
3 for use in this trial, wasn't it?

4 A Yes.

5 Q That affidavit is dated the 26th of March,
6 1946, is it not?

7 A Yes.

8 Q When did you become a prisoner of the
9 Soviet forces?

10 A It was on the 27th of September, 1945.

11 Q Do you know any reason why you have not
12 been repatriated to Japan?

13 A I don't know.

14 MR. BLAKENEY: That concludes my cross-
15 examination, but other counsel will cross-examine on
16 behalf of particular defendants.

17 THE PRESIDENT: Mr. Blewett.

18 MR. BLEWETT: If the Tribunal please, I wish
19 to cross-examine on behalf of the defendant TOJO.

20 CROSS-EXAMINATION (Continued)

21 BY MR. BLEWETT:

22 Q In your amended affidavit of 20 October 1947,
23 you refer, in paragraph 5, to a visit during the summer
24 of 1941 to Prime Minister TOJO. Now, did you write
25 that statement out in your own hand?

1 A May I see my affidavit for a moment?

2 Q Well, this is just a few days ago that you
3 made out this affidavit. You certainly should remember
4 whether you wrote it out or not.

5 A I do remember having written the affidavit,
6 but I have a feeling that you ask me now whether or
7 not I met Prime Minister TOJO, and it was War Minister
8 TOJO that I met. Aren't you referring to War Minister
9 TOJO?

10 Q No, I asked you whether you wrote this affi-
11 davit out in your own hand?

12 THE PRESIDENT: He said he did.

13 A I wrote it in my own hand.

14 Q Now, where did this conversation take place?

15 A At the War Ministry.

16 Q On what date?

17 A I forgot the date.

18 Q Who was present at the time?

19 A I believe I met with TOJO just by myself.

20 I believe that only two of us were in the room.

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1 Q Was the purpose of your visit to him a social
2 call or an official visit?

3 A It was not a personal visit. I went there
4 in order to find out something in the line of my offi-
5 cial duties.

6 Q Well, now, you know that he was not the Premier
7 at that time as you stated just a few moments ago,
8 don't you?

9 A Yes.

10 Q At least, I assume that this visit took place
11 before October 1941?

12 A Yes, I believe it was in August that I visited
13 him.

14 Q Did you have an opportunity of reading over and
15 correcting this affidavit after it was prepared?

16 A I did not feel there was any necessity of
17 making corrections.

18 Q But still you tell us now that at the time
19 you knew that TOJO was not Premier at the time, but
20 you referred to him as Premier.

21 A I should like to be permitted to see my
22 affidavit.

23 MR. BLEWETT: Will the Captain please hand
24 the witness the affidavit, the one of October 20?
25

(Whereupon, a document was handed

1 to the witness.)

2 Q It is paragraph 5.

3 A I shall reply. I recall that it was in
4 August of 1941 that I went to Tokyo and, therefore,
5 the words I used, "Prime Minister TOJO" is a mistake,
6 and it should be corrected to "War Minister TOJO."
7 I don't know what the procedure is in such cases, but
8 I should like to ask that the words "Prime Minister
9 TOJO" appearing in paragraph 5 of my affidavit be cor-
10 rected to "War Minister TOJO."

11 Q Well, now, did it occur to you, when you were
12 reading over this affidavit, that it might be a vital
13 matter to correct that mistake?

14 A When I reread my affidavit, I just let this
15 matter pass without thinking of it at all.

16 THE MONITOR: Without noticing it.

17 Q I also call your attention to paragraph 2
18 of your later affidavit, in which you refer to page 11
19 of the Japanese text. Now I will ask you if there is
20 a page 11 in your Japanese text?

21 That is your first affidavit. Do you have
22 that?

23 A I believe that my first Japanese affidavit
24 does have a page 11. That is why I was asking for a
25 correction.

1 Q Well, now, I will ask you if, in fact, you
2 wrote this affidavit, or if it is not a fact that it
3 was written for you?

4 A In drawing up this affidavit, I had a con-
5 ference with Colonel Ivanov. The first and second
6 points were written on my desire. In regard to points
7 subsequent to point 3, these were written in reply --
8 these are my replies to Colonel Ivanov's questions.
9 A Russian stenographer was present. She took down my
10 replies in Russian. These were retranslated back into
11 Japanese, and that is the final form in which my
12 affidavit appeared.

13 Q Now, are there any further inaccuracies here
14 that you would like to correct for the Tribunal?

15 A As I have told you, other than the phrase
16 "Prime Minister" -- words "Prime Minister," I believe
17 there are none at present.

18 Q Did you look at your Japanese text of your
19 first affidavit, and is there a page 11 in that affi-
20 davit? What is the last numbered page?

21 A The affidavit I saw, the Japanese affidavit
22 I saw, was not the one I wrote in my own handwriting,
23 but the typed copy.
24

25 THE PRESIDENT: Have you much of this sort
of thing? Otherwise, it isn't worth wasting time on

1 it.

2 MR. BLEWETT: I am willing to pass on, sir.

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1 Q Now, this conversation you had with
2 War Minister TOJO, did he not speak to you at that
3 time regarding administrative matters concerning
4 his specific position as the Minister of State?

5 A General TOJO told me as representative
6 in my position as Chief of the General Affairs
7 Board of the Manchukuo Government, representing
8 the Manchukuo Government, that the Manchukuo
9 Government should give all possible aid to the
10 furtherance of the Kantokuen plans which was to
11 enforce -- which would enforce the Kwantung Army --
12 reinforce the Kwantung Army.

13 Q But I believe you testified here that
14 your main purpose in taking an airplane and going
15 to Tokyo was to inquire of War Minister TOJO
16 whether or not there was to be a war with the U.S.S.R.,
17 is that not right?

18 A Yes.

19 Q And he told you "not so."

20 A Yes.

21 Q Now, in the last paragraph of your affidavit
22 of October 20 you referred to TOJO as Chief of the
23 Kwantung Army Staff and that he endeavored to carry
24 out military measures directed against the Soviet
25 Union. What is the basis of your statement?

1 A At the time I was in Manchukuo and I
2 was General Director of the Kwantung Bureau. That
3 is why I know about it. It is natural that the
4 Chief of Staff of the Kwantung Army should endeavor --
5 should exert his endeavors in connection with military
6 operations against the Soviet Union.

7 Q Now, do you not mean by that statement
8 that the Chief of Staff merely carried out the
9 ordinary duties pertaining to his position?

10 A I can't understand your purport. May I
11 have it repeated, please?

12 (Whereupon, the Japanese court
13 reporter read.)

14 A (Continuing) I think there is no doubt
15 about the fact that the Chief of Staff as his
16 duties exerted his efforts in connection with
17 operations against the Soviet Union.

18 Q And those operations, as you have explained
19 to us very fully, were purely defensive, were
20 they not?

21 A I believe that the term "purely defensive"
22 is somewhat insufficient, because that term always
23 carried an implication that the Kwantung Army was
24 always ready to take the offensive.

25 Q Well, take the meaning that you gave us as

1 defensive. These plans in the main were operational,
2 were they not?

3 COLONEL IVANOV: The witness has previously
4 replied in the course of the cross-examination
5 by the defense that he is not familiar with the
6 operational plans of the Kwantung Army. I object
7 on the ground that this question is repetitive. The
8 answer to this question has been already given.

9 MR. BLEWETT: I am satisfied with the
10 reply to the previous answer, your Honor.

11 That will be all the cross-examination,
12 if the Court please.

13 DR. TAKAYANAGI: I should like to conduct
14 cross-examination for the defendant SUZUKI, Teichi.

15 CROSS-EXAMINATION (Continued)

16 BY DR. TAKAYANAGI:

17 Q I should like to cross-examine you, Mr.
18 Witness, in reference to paragraph 2 of this
19 affidavit in which you stated: "Naturally, at the
20 present time I do not remember the exact wording
21 of ARAKI's and SUZUKI's statements, as many years
22 have elapsed since then."

23 A Yes, I did state that.

24 Q And then you go on to state, do you not,
25 that the purport, the main purport, of ARAKI's --

1 Then you go on to state, referring to ARAKI's and
2 SUZUKI's statement and say that the main purport
3 of ARAKI, Sadao's statement as follows.

4 A Yes.

5 Q Did you write down this statement with
6 sufficient care and are there any corrections
7 necessary?

8 THE INTERPRETER: "I take it that you have
9 no need for further corrections as I suppose you
10 have written this part of your affidavit with all
11 due care."

12 THE PRESIDENT: Do not ask him questions
13 like that. Do ask him something substantial.

14 Be sure to say "Yes."

15 DR. TAKAYANAGI: Yes.

16 That was a preliminary question and I shall
17 go into substance now.

18 THE PRESIDENT: Dispense with preliminary
19 questions.

20 Q You state in your affidavit, page 1 of the
21 English text, that "The gist of ARAKI's address was
22 that Japan had brought about the Manchurian Incident,
23 established the State of Manchukuo..." and so forth.
24 Now, it seems to me that this is entirely different
25 from the official interpretation of the Japanese

1 Government at that time. Do you think -- Now,
2 don't you think it is so?

3 A It has been said that the establishment
4 of Manchukuo was based upon the unanimous will of
5 the thirty million people inhabiting Manchukuo.
6 But since the Manchukuo Incident it has become
7 clear that it was Japan that established Manchukuo,
8 and therefore I adopted the expression that Japan
9 established Manchukuo because actually that is
10 what Japan did.

11 Q Then, what you have written is not the
12 purport of what ARAKI said, but it is your own
13 observation, is it not?

14 A Well, I wrote the purport of what General
15 ARAKI said without bothering about the minor
16 details -- the specific details. What I meant
17 when I said that I wrote the gist of ARAKI's
18 address is just that.
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1 Q Well, however, from the wording of the
2 affidavit it seems that this is what ARAKI actually
3 said, but the fact is not so, is it?

4 A There is no mistake in that. I did express
5 ARAKI's thoughts.

6 Q Then it follows, does it not, that the
7 statement of the War Minister was entirely differ-
8 ent from the official interpretation -- official
9 statement of the Japanese Government at that time?

10 THE MONITOR: "Statement of War Minister
11 ARAKI."

12 COLONEL IVANOV: If your Honor please, the
13 counsel of SUZUKI is now conducting the cross-
14 examination on behalf of the defendant ARAKI. We
15 would not object to this cross-examination if we knew
16 that he is authorized to do so, but if he is conduct-
17 ing this cross-examination at his own desire, we do
18 object to it.

19 DR. TAKAYANAGI: My position in asking this
20 question is that my question has an important bearing
21 on the credibility of that affidavit, and therefore
22 it has an important bearing upon the accused SUZUKI.
23 Therefore, I am asking this question.

24 THE PRESIDENT: Well, I do not think that
25 is sufficient ground actually. If we do apply that

1 test, there is no question that we would disallow.

2 The objection is upheld.

3 ARAKI's counsel can effectively cross-
4 examine, if necessary.

5 DR. TAKAYANAGI: I have failed to mention
6 that I have been authorized by the accused ARAKI
7 with the consent of his counsel to ask this question
8 in his behalf.

9 THE PRESIDENT: One counsel cannot transfer
10 his responsibility to another without the concurrence
11 of the Court.

12 DR. TAKAYANAGI: Then, could I not get that
13 permission?

14 THE PRESIDENT: No, we have refused it
15 previously. There is no good ground for granting
16 such permission.

17 DR. TAKAYANAGI: Then, I shall discontinue
18 the question concerning the accused ARAKI, and I
19 shall ask you from a different aspect.

20 Q You state in your affidavit that the Confer-
21 ence, namely, the Conference of the Prefectural
22 Governors was held at the great auditorium of the
23 Toyoma Military School in Tokyo. Was it not very
24 unusual?

25 A I think there were other instances where

1 the Conference of Prefectural Governors was held in
2 the auditorium of the Toyoma Military School. I
3 have attended other conferences which were also held
4 in this auditorium.

5 Q Was it not held ordinarily in the cabinet?

6 A Well, it was a custom that on the day on
7 which the Prefectural Governor's Conference was
8 opened the Premier would make a speech opening the
9 Conference at the cabinet, but then on the following
10 days sessions were held at the various ministries.

11 Q Do you know an organization known as the
12 Servicemen's Assistance Association?

13 A I am afraid I don't know very well of that
14 society.

15 Q Can you name -- can you state the names of
16 a few Prefectural Governors who attended the Confer-
17 ence on the same day and listened to the addresses
18 of War Minister ARAKI and SUZUKI?

19 A Well, there are almost fifty Prefectural
20 Governors in all, but among the Governors, those of
21 Prefectures near me, were, for instance, Governor
22 ISHIGURO of Iwate Prefecture, Governor AKAGI of
23 Miyagi Prefecture, and Governor ISHIWARA of Yamagata
24 Prefecture.

25 Q Do you remember whether Mr. KOSAKA, Yasumasa

attended at this Conference as a Prefectural Governor?

1 A I don't recall.

2 Q Do you not mean the statement -- was the
3 statement which you alleged to have been made by the
4 War Minister and SUZUKI at the meeting of the Prefec-
5 tural Governors actually the address made by them
6 that you heard at a meeting of the Servicemen's
7 Assistance Association where you were invited to
8 attend?
9

10 A No, that is not so. This was at a session
11 of the Prefectural Governor's Conference, and it was
12 held in the auditorium of the Toyoma Military School,
13 half as a secret meeting.

14 Q Were there not the maps of Manchuria and
15 the Soviet Union in the great auditorium?

16 A Yes.

17 Q Is there no mistake in that?

18 A No.

19 DR. TAKAYANAGI: That is all.

20 THE PRESIDENT: Is there any further cross-
21 examination?

22 MR. BLAKENEY: That appears to be all, your
23 Honor.

24 THE PRESIDENT: Well, I have questions on
25 behalf of one of the Members of the Tribunal.

1 BY THE PRESIDENT:

2 Q Why were you imprisoned by the Russians?

3 A I know of no reason why I was imprisoned.

4 Q Who made the order of imprisonment?

5 A On the 24th of January, last year, Lieutenant
6 General Dolgikh, Chief of the Internal Affairs Bureau
7 of Khabarovsk State, told me that I was to be im-
8 prisoned, and on the following 25th I was taken by
9 the major, who was in charge of the internment camp
10 where I was interned, to the prison.

11 THE PRESIDENT: Colonel Ivanov, will there
12 be any re-examination?

13 COLONEL IVANOV: Yes, your Honor. I'd
14 like to start my redirect examination after the
15 recess.

16 THE PRESIDENT: We will adjourn until half
17 past one.

18 (Whereupon, at 1200, a recess was
19 taken.)

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AFTERNOON SESSION

The Tribunal met, pursuant to recess, at 1330.

MARSHAL OF THE COURT: The International Military Tribunal for the Far East is now resumed.

THE PRESIDENT: Colonel Ivanov.

ROKUZO TAKEBE, called as a witness on behalf of the prosecution, resumed the stand and testified through Japanese interpreters as follows:

REDIRECT EXAMINATION

COLONEL IVANOV: I am starting the redirect examination of the witness TAKEBE.

BY COLONEL IVANOV:

Q Mr. Witness, answering the questions put by defense counsel, you said that the Japanese troops were stationed in Manchuria for the purpose of self-defense. However, realizing these defensive aims, they had to take the offensive position, and further, that after 1944 theirs was a purely defensive stand. Is that so?

A It is as you say.

Q Thus, in your first affidavit and in the course of the cross-examination, you drew a distinction between defense and what you call pure defense, did you not?

A When I said "defense" I meant a defense that

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1 included offense to a certain extent. The word "defense"
2 can be said to have a very broad meaning, and for
3 example, the occupation by Japan of Manchuria was also
4 called defense.

5 Q Do I understand you correctly, that the term
6 "defense" known to you included the occupation of
7 territories of other countries by Japan? Is that so?

8 A When I say "defense with an offensive atti-
9 tude" that is what I mean.

10 Q The working out of conditions of occupation
11 regime on Soviet territories in which work the Kwantung
12 Army headquarters was engaged was also included in the
13 term "defensive stand" of the Kwantung Army of 1941 and
14 1942, is that right, and as you said about this in
15 your affidavit and in your reply to the defense counsel?

16 A I shall reply. That was also included.

17 Q General UMEZU was Commanding General of the
18 Kwantung Army at that time, was it so?

19 A Yes, it was General UMEZU.

20 Q Mr. Witness, answering the questions put by
21 defense counsel, you said that when the war broke out
22 between the USSR and Germany, the strength of the Soviet
23 troops in the Far East somewhat decreased, is that so?

24 A Yes, I so testified.

25 Q Tell us, Witness, did the strength of the

1 Kwantung Army increase considerably after the outbreak
2 of the Soviet-German war?

3 A Yes, it was increased.

4 Q Were not the changes in the strength of the
5 Soviet troops and the increase of the strength of the
6 Kwantung Army connected with the difficult position of
7 the Soviet Union at the beginning of the Soviet-German
8 war?

9 MR. BLAKENEY: That is objected to as calling
10 for a conclusion of the witness, and of course leading,
11 like all of his questions.

12 THE PRESIDENT: Colonel, you have been leading
13 all throughout, and he is your witness and you are not
14 supposed to lead him until he is declared hostile.
15 He does not appear to be hostile.

16 We will have to allow the objection on that
17 ground.

18 COLONEL IVANOV: I will change the form of my
19 question, then.

20 Q Has the situation at the Soviet-German front
21 in that period of time any significance with regard to
22 the changes in the strength of Soviet troops and the
23 Kwantung Army, and what was that situation for the Soviet
24 Union?

25 MR. BLAKENEY: I object to that question as

1 calling for the witness' conclusion in a matter in which
2 he is ignorant and in which his opinion could not assist
3 the Tribunal.

4 THE PRESIDENT: I don't think that technical
5 military knowledge is required to answer a question like
6 that. The objection is overruled and the question
7 allowed.

8 A I am sorry; I wasn't able to get the meaning
9 of your question. Please repeat it.

10 COLONEL IVANOV: Will the Japanese court re-
11 porter repeat the question, please?

12 (Whereupon, the last question was
13 read by the Japanese court reporter.)

14 A (Continuing) Well, I think that the war situation
15 of the Soviet-German war was very unfavorable for the
16 Soviet Union. I have no sufficient knowledge of how that
17 affected the relative strengths of the Soviet and Kwan-
18 tung Armies.

19 Q The construction of strategic railways and
20 highways, fortified areas, airfields, barracks, and
21 other military objectives was carried on in accordance
22 with the instructions given annually by the Commander of
23 the Kwantung Army, was that so?
24

25 THE PRESIDENT: That is leading, Colonel. I
told you you can't do that. We have not allowed any

1 other counsel to do it. We cannot make any exceptions.

2 COLONEL IVANOV: I will change the form of
3 this question, if the Tribunal please.

4 Q Was the construction of strategic railways and
5 highways, fortified areas, airfields, barracks, and other
6 military objectives, carried out or not in Manchuria,
7 in accordance with the instructions by the Kwantung
8 Army?

9 THE INTERPRETER: Correction, please: In-
10 stead of "railways and airfields, military objectives,"
11 insert "military objectives."

12 MR. BLAKENEY: I object to that question as not
13 arising in any way out of cross-examination.

14 THE PRESIDENT: It is also leading, as permitting
15 of the simple answer of yes or no.

16 It is very difficult to say what is or what
17 is not within the scope of this affidavit. It is
18 overruled on the ground that it is leading. The ques-
19 tion is disallowed on the ground that it is leading.

20 Colonel, in re-examination, as I understand it,
21 the re-examining counsel confines himself to clearing up
22 matters which are left obscure or not sufficiently ex-
23 plained during the course of cross-examination.
24
25

1 COLONEL IVANOV: If your Honor please, I
2 submit that the question of the construction of a
3 strategic base in Manchuria has not been made
4 sufficiently clear in the course of the cross-examina-
5 tion by the defense who conducted this cross-examina-
6 tion on this particular point. I would like to ask
7 only one question on this particular point.

8 Q In your reply to the defense you stated that
9 numerous military objectives were being constructed
10 in Manchuria. Tell us, Witness, do you know on the
11 border with what state these military objectives were
12 being constructed?

13 A They were built on the Soviet-Manchurian
14 border.

15 Q Answering the questions put by defense counsel,
16 you said that in accordance with UMEZU's instructions
17 the compulsory mobilization of labor took place. Was
18 it so?

19 MR. BLAKENEY: I object to that question on
20 the ground that there is no mention whatsoever in
21 cross-examination of compulsory mobilization of labor.

22 COLONEL IVANOV: I am prepared to make this
23 question clear as the defense desires. I will change
24 the term "compulsory" labor to simply labor -- mobiliza-
25 tion of labor.

1 THE PRESIDENT: The objection is on the
2 ground that it does not arise out of the cross-examina-
3 tion, and I don't recollect that it does.

4 COLONEL IVANOV: If your Honor please, the
5 witness has repeatedly mentioned this measure taken
6 in Manchuria in accordance with the instructions of
7 General UMEZU, especially yesterday during the cross-
8 examination by the defense counsel. However, the de-
9 fense did not trace this measure up to the results to
10 which this measure led.

11 THE PRESIDENT: Well, none of us feels that
12 anything was left obscure or requires explanation in
13 that regard.

14 Q Tell us, Witness, did the population of Man-
15 churia approve of the compulsory mobilization of labor
16 and the measures for the mobilization of labor -- of
17 manpower?

18 MR. BLAKENEY: That is objected to as im-
19 material and as not arising out of anything touched upon
20 in the cross-examination.

21 THE PRESIDENT: Objection upheld.

22 COLONEL IVANOV: If your Honor please, may
23 the witness be shown the Japanese translation of ex-
24 hibit 731-A?

25 (Whereupon, a document was handed

1 to the witness.)

2 Q Mr. Witness, have you read at my request the
3 Japanese translation of exhibit 731-A?

4 A Yes, I did.

5 Q Do you know the facts mentioned in this ex-
6 hibit?

7 MR. BLAKENEY: If the Court please, that
8 question is objected to as importing new matter not
9 arising out of the cross-examination.

10 THE PRESIDENT: I will ask the court reporter
11 to repeat it; I was reading a cablegram when it was put.

12 (Whereupon, the last question was
13 read by the official court reporter.)

14 MR. BLAKENEY: The witness is now being asked,
15 apparently, to confirm some statements of fact con-
16 tained in some other exhibit introduced by the prosecu-
17 tion, which in no way arises out of any of his testimony
18 here.

19 THE PRESIDENT: What have you to say, Colonel?

20 COLONEL IVANOV: Your Honor, I had no oppor-
21 tunity to ask this question and to submit and to pro-
22 duce this exhibit in the course of my direct examina-
23 tion -- to ask the witness this question and to pre-
24 sent this document to him. I ask the permission of the
25 Court to be allowed to do so in my redirect examina-

1 tion. Furthermore, the defense has devoted much
2 attention to the question of Kyowakai during the
3 cross-examination. I submit that the asking of this
4 question is justified by these considerations.

5 IR. BLAKENEY: This document went into evi-
6 dence on the 11th of October, 1946, which is some-
7 thing over one year ago.

8 THE PRESIDENT: Permission is refused by a
9 majority.

10 Q Witness, in reply to the questions put by the
11 defense counsel you stated that during several months
12 in 1946 you were imprisoned in Khabarovsk. Were you
13 interrogated during that period of time?

14 A May I have the stenographic record repeated,
15 please?

16 (Whereupon, the last question was
17 read by the Japanese court reporter.)

18 A (Continuing) I shall reply.

19 During that period I was interrogated by the
20 head of the Khabarovsk branch of the Ministry of Inter-
21 nal Affairs of the Soviet Union.

22 Q Were you or were you not charged with any
23 offense?

24 A I was unable to get it clearly over the micro-
25 phone. Please repeat it.

1 (Whereupon, the last question
2 was read by the Japanese court reporter.)

3 A (Continuing) No, I was not told that I was
4 charged with anything.

5 Q That was the result of these interrogations?
6 Were you set free?

7 A As I told the Tribunal this morning, I was not
8 told the reason for which I was put into prison, but I
9 suppose that some suspicion had been cast upon my
10 activities while in Manchuria, and that I was put into
11 prison in order to be investigated regarding those
12 activities by the authorities. This investigation was
13 carried on for quite a long time, but at the end of
14 four months I was released, and so I thought all sus-
15 picion has been cleared.

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1 Q Were you interrogated on March 26, 1946,
2 by Colonel Baginyan, the military investigator of the
3 USSR at the International Military Tribunal for the
4 Far East?

5 A Yes, I was interrogated.

6 Q Did the interrogating officer state to you
7 his position and did he tell you that you were being
8 interrogated as a witness in the case of the Japanese
9 major war criminals?

10 A Yes, I was told. That part is supposed to be
11 attached to my affidavit. I think you will find it
12 there.

13 Q Was the interrogation conducted in or out-
14 side the prison?

15 A The interrogation was conducted in the
16 building of the Khabarovsk branch of the Soviet
17 Ministry of Internal Affairs and it was not conducted
18 in the prison.

19 THE PRESIDENT: I do not think that any
20 Member of the Tribunal wants you to investigate the
21 circumstances under which the interrogation was made.

22 COLONEL IVANOV: I would like to ask only
23 one last question, may it please the Court.

24 Q Were you or your testimony, given on March 26,
25 1946, influenced by the fact that you at that time

1 were kept in prison at Khabarovsk?

2 A No, that had nothing to do with my attitude.

3 COLONEL IVANOV: Your Honor, the defense
4 asked some questions concerning page 11, which was
5 mentioned in his additional affidavit. I want to
6 make it clear to the Tribunal that the witness in
7 the course of the drawing of the additional affidavit
8 was using a processed copy of his first affidavit in
9 the Japanese language. In the processed copy the
10 questions mentioned by the witness are on the 11th
11 page of the affidavit of the Japanese text.

12 THE PRESIDENT: That is enough because
13 Mr. Blewett abandoned that line of examination at
14 the Court's suggestion.

15 COLONEL IVANOV: I would like to refer the
16 Tribunal to the transcript pages where excerpts of
17 exhibit 670 were introduced. Excerpts from this
18 exhibit were on the following transcript pages:
19 7330, 7581--7586, 7598--7600, 8078--8080. The ex-
20 cerpts introduced by the defense are on transcript
21 pages 23,278 and 23,183.

22 If there are no additional questions to the
23 witness may he be excused on the usual terms?

24 THE PRESIDENT: I have a question on behalf
25 of a Member of the Tribunal:

1 Did the Russian colonel who interrogated
2 you tell you that you were to be a witness or an
3 accused before this Tribunal?

4 THE WITNESS: Was this question, your
5 Honor, addressed to myself?

6 THE PRESIDENT: Addressed to you, yes.

7 THE WITNESS: I was not told that I was to
8 be one of the accused. After my arrival in Tokyo
9 I was told that I might be a witness.

10 THE PRESIDENT: Yes, that is sufficient.

11 MR. BLAKENEY: It is understood, of course,
12 that the releasing of the witness on the usual terms
13 includes his being made available to the defense for
14 consultation in accordance with the agreement of this
15 morning in Chambers.

16 THE PRESIDENT: There is no need to ask for
17 any assurance, Major.

18 GENERAL VASILIEV: That is quite true, your
19 Honor.

20 THE PRESIDENT: He is excused on the usual
21 terms.

22 (Whereupon, the witness was excused.)

23 COLONEL IVANOV: I now call the prosecution
24 witness MATSUURA, Kusuo.
25

- - -

1 K U S U O M A T S U U R A, called as a witness on
2 behalf of the prosecution, being first duly
3 sworn, testified through Japanese interpreters
4 as follows:

5 DIRECT EXAMINATION

6 BY COLONEL IVANOV:

7 Q Will the witness state his first and last
8 name?

9 A My name is MATSUURA, Kusuo.

10 Q How old are you?

11 A I am thirty years old -- I am thirty-one.

12 Q Are you at present a prisoner of war of the
13 Soviet Army?

14 A Yes.

15 COLONEL IVANOV: May the witness be shown
16 exhibit 833?

17 Q Witness, is that your affidavit and did you
18 sign it?

19 A This is my affidavit and I have signed it.

20 Q Did you testify without any duress?

21 A I made my testimony without any duress.

22 Q Are all the statements contained in your
23 affidavit true and correct?

24 A They are true and correct; however, in one
25 part of my affidavit I made a mistake in the name of

1 one person so I should like to correct that name.

2 Q Tell us what name did you state incorrectly
3 and how should it be properly read?

4 A On page 8 of the Japanese text, page 4 of
5 the English text, line eleven, "Major AOSHIMA
6 Ryoichiro, senior army intelligence staff officer,"
7 should be corrected to "Major NAKANISHI, Masujiro,"
8 of the same rank.

9 Q Any other changes?

10 A No, no other corrections.

11 COLONEL IVANOV: With the Court's permission
12 I will put two additional questions to the witness.

13 Q Was the Kwantung Army staff engaged in the
14 working out of the occupation administration system
15 for the Soviet territories?

16 A In August, 1943, when I assumed my post in
17 the Kwantung Army headquarters the then chief of the
18 code section, Major KOBAYASHI, made the following
19 explanation to me, namely, that under the Kantokuen
20 plan a fifth section had been added to the staff of
21 the Kwantung Army headquarters and that this fifth
22 section was occupied with the investigation of the
23 administration of occupied areas. When I assumed my
24 post this fifth section was no longer in existence,
25 but there was an officer and a few other men who were

1 engaged in what they called disposing of the
2 remaining business of that section.

3 Q Who was the commanding general of the
4 Kwantung Army at that time?

5 A General UMEZU, Yoshijiro.

6 COLONEL IVANOV: Your Honor, certain
7 excerpts from exhibit 833 were read into the record
8 both by the prosecution and by the defense. The
9 excerpts read by the prosecution are to be found at
10 pages 8087--8089, 8173--8174; the excerpts read by
11 the defense are to be found at pages 23,276, 23,277.
12 That is all.

13 The defense may now cross-examine the
14 witness MATSUURA, Kusuo.

15 THE PRESIDENT: Major Blakeney.
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CROSS-EXAMINATION

1 BY MR. BLAKENEY:

2 Q Witness, what was the date of the Anti-
3 Comintern Pact and the Tripartite Alliance?

4 THE PRESIDENT: Why are you asking him that?

5 MR. BLAKENEY: Because he refers to it on
6 page --

7 THE PRESIDENT: It is an admitted fact be-
8 fore the Court.

9 MR. BLAKENEY: I am testing his memory.

10 THE PRESIDENT: We cannot turn this into a
11 quiz session voluntarily.

12 MR. BLAKENEY: This man has made many ex-
13 tremely broad statements tending to implicate many
14 of these defendants, including some on this point
15 which I am now mentioning which you will find on page
16 6 of his affidavit.

17 THE PRESIDENT: Colonel Ivanov.

18 COLONEL IVANOV: I object to this question
19 as being without the scope of this affidavit, and I
20 should also like to object to the statement made at
21 the lectern by the defense counsel as being improper.

22 THE PRESIDENT: He is purely a soldier, as
23 far as I can judge, and he shouldn't be asked questions
24 about what are really political events.
25

1 MR. BLAKENEY: Then he shouldn't have testi-
2 fied to them. If I may continue the demonstration of
3 how it is material, I think it is perfectly plain.
4 This man states that certain things occurred, certain
5 things which are charged here as part of a campaign
6 of preparation of aggression against the USSR, and he
7 fixes that time -- and I am referring to the second
8 paragraph from the bottom of page 6 of his affidavit --
9 as being at the time of the conclusion of the Anti-
10 Comintern Pact and the Triple Alliance. And I do
11 think that by any rule I must have the right to find
12 out whether he knows when that time was.

13 THE PRESIDENT: We want questions that will
14 be really directed to elicit useful answers. Let him
15 answer. The objection is overruled. Let him answer
16 to save time, but we will see what help we are going
17 to get. Let us have a demonstration of the value of
18 these things.

19 A May I have the question repeated, please?
20 Explain it again, please.

21 Q What was the date of the Anti-Comintern
22 Pact and the Triple Alliance between Japan, Germany
23 and Italy?

24 A I have no clear recollection of the date.

25 Q Then how do you know that certain Japanese

1 propaganda toward the USSR took place at that time?

2 A My affidavit -- I do not think my affidavit
3 contains any reference to specific propaganda.

4 Q Do you know what is in your affidavit?

5 A Yes, I do.

6 Q Who wrote your affidavit?

7 A I wrote it myself.

8 Q How long since you've seen your affidavit?

9 A It was on May 18 of last year when I signed
10 it.

11 Q You haven't been shown it since you've
12 been in Japan, or a copy of it?

13 A I did see a copy.

14 Q When?

15 A Immediately after my arrival, that is to
16 say, on the 16th of October.

17 Q Are you a graduate of the Japanese Army
18 Staff College?

19 A No.

20 Q Therefore, you were not eligible ever to
21 occupy staff positions, were you?

22 A That is so.

23 Q You are quite sure that the Japanese Kwan-
24 tung Army was planning aggression against the Soviet
25 Union during 1941 to '45, aren't you?

COLONEL IVANOV: The prosecution objects to the question being put in such form by the defense counsel. I am referring to the using of the term "aggression" in the question.

THE PRESIDENT: I cannot see that it is objectionable on that ground. The objection is overruled. He is cross-examining counsel and can make suggestions.

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1 Q You are quite sure of that, aren't you?

2 A What do you mean by what I said before?

3 Q I say you are quite sure, aren't you, that the
4 Japanese Kwantung Army was planning aggression against
5 the Soviet Union during the years from 1941 to 1945?

6 A As is written in my affidavit, I knew of this
7 because I had been told of it from specific persons.

8 Q Now, in that plan for war against the Soviet
9 Union the plan known as the Kantokuen was quite an
10 important factor, was not it?

11 A Yes.

12 Q Kantokuen means Kwantung Army special maneuvers,
13 doesn't it?

14 A Yes.

15 Q However, according to your testimony the
16 Kantokuen applied also to the Mongolia Army and the
17 Korea Army, didn't it?

18 A No, that isn't so.

19 Q It didn't apply to either of those?

20 A I don't believe it applied to the Mongolia
21 Stationary Army or to the Korean Army.

22 Q Well, now, just a moment and I will read you
23 something from your affidavit which you apparently have
24 never read. Did you give this answer in your affidavit,
25 top of page 6?

1 A May I have the affidavit?

2 Q Just a minute. I haven't read it to you yet.

3 COLONEL IVANOV: I am supporting the request
4 made by the witness to give him an opportunity to see
5 for himself what is written in his affidavit -- what is
6 contained in his affidavit.

7 THE PRESIDENT: We will undertake to see that
8 nothing in his affidavit is misrepresented.

9 COLONEL IVANOV: Well, I would like you to take
10 into account that the affidavit was drafted in the
11 Japanese language and not in English and the defense
12 counsel is going to read it in English.

13 THE PRESIDENT: It will be repeated in Japanese
14 to the witness.

15 Q Did you or did you not give this answer in your
16 affidavit as follows --

17 THE PRESIDENT: I doubt the validity of this
18 method of approach anyhow. Has he contradicted anything
19 that he said in his affidavit yet?

20 MR. BLAKENEY: Yes, sir. He has just at this
21 moment told me that the Kantokuen did not apply either
22 to the Mongolian Stationary Army or the Korean Army.

23 THE PRESIDENT: Well, you can refer us to any
24 different statement in his affidavit. We don't want you
25 to have an argument with him about it.

1 MR. BLAKENEY: Well, if I cannot put the contra-
2 diction to the witness, I will refer the Tribunal to the
3 first answer at the top of page 6, which has not been
4 read in evidence, by the way, and to the last paragraph
5 but one from the bottom of page 4, also not read into
6 evidence, in which the witness directly contradicts his
7 present testimony concerning the Korea Army.

8 THE PRESIDENT: That will save time.
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1 COLONEL IVANOV: Your Honor, it doesn't follow
2 from the Russian text of this affidavit what has been
3 stated here by Mr. Blakeney.

4 RUSSIAN MONITOR: From the Russian transla-
5 tion of this affidavit.

6 COLONEL IVANOV: I suppose the Language Sec-
7 tion will make it clear for us with regard to the three,
8 to all the three copies of this affidavit.

9 THE WITNESS: I should like to be permitted
10 to make an explanation on that point.

11 THE PRESIDENT: The Language Section will
12 make it clear as far as regards the Japanese text.
13 We have no Russian language section.

14 MR. BLAKENEY: The English text, of course,
15 is official.

16 BY MR. BLAKENEY (Continued):

17 Q When did you go to the Kwantung Army?

18 A From August 1943 to August 1945.

19 Q Before going to the Kwantung Army for some
20 time you were with the Mongolia Expeditionary Army,
21 weren't you?

22 A Yes, I was with that army for about two years
23 and a half.

24 Q The Mongolia Occupation Army, of course, was
25 under the command of the China Expeditionary Army,

wasn't it?

1 A Yes.

2 Q No connection whatever in the chain of com-
3 mand with the Kwantung Army, was there?

4 A No connection in the chain of command.

5 Q And the Korea Army also was an independent
6 army not under the command of the Kwantung Army?

7 A That is so.

8 Q During all this period, from approximately
9 1940 to 1945, you were a sort of cipher clerk, first
10 in the Mongolia and then in the Kwantung Army, weren't
11 you?

12 A Yes.

13 Q And your responsibilities were only that of
14 cipher work, weren't they?

15 A Yes. As far as my duties went, that is so.

16 Q Now, did the Kantokuen Plan pass through your
17 hands in cipher form to be deciphered by you?

18 A No, not the Kantokuen.

19 Q Did you ever see the Kantokuen Plan?

20 A No, never.

21 Q Such things were rather on the secret side,
22 weren't they?

23 A Yes, just as you said.

24 Q They weren't confided to just every officer,

1 but only to officers whose duties had some connection
2 with them, isn't that so?

3 A Yes, of course.

4 Q In fact, mostly very high ranking officers?

5 A Well, even if they were not high ranking
6 officers, if they had duties in connection with that
7 plan they would know about it.

8 Q All right. Now, all you really know about
9 the Kantokuen Plan is what you were told about it by
10 some captains and majors long after it went into effect,
11 isn't it?

12 A I can't understand the meaning of your ques-
13 tion. May I have it repeated, please?

14 THE PRESIDENT: We will recess for fifteen
15 minutes.

16 (Whereupon, at 1445, a recess was
17 taken until 1500, after which the proceedings
18 were resumed as follows:)
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1 MARSHAL OF THE COURT: The International
2 Military Tribunal for the Far East is now resumed.

3 THE PRESIDENT: Major Blakeney.

4 BY MR. BLAKENEY (Continued):

5 Q Now, my last question before the recess,
6 which you found it difficult to understand, was this:

7 Is it not a fact that all you knew about the
8 Kantokuen was what you were told about it by some
9 captains and majors long after it went into effect?

10 A Just as you say. However, those who told me
11 of this plan were those who in the line of duty knew
12 of the plan then and knew of it later.

13 Q All right. We will come to that later.

14 Now, these informants of yours told you, didn't
15 they, that under the Kantokuen, two new area armies
16 had been organized under the jurisdiction of the Kwan-
17 tung Army?

18 A Yes.

19 Q Did the organization of those two new area
20 armies mean that additional divisions, corps, armies,
21 were brought into the Kwantung Army, or did it mean
22 only a reorganization of the then existing forces in
23 the Kwantung Army?

24 A Well, I don't know which it meant.

25 Q Do you know, in fact, whether the strength of

1 the Kwantung Army was or was not increased as a result
2 of the Kantokuen Plan?

3 A Not in detail.

4 Q Now, what did the Mongolia Occupation Army do
5 under the Kantokuen?

6 A The Mongolia Stationary Army had nothing to
7 do directly with the Kantokuen Plan; but as an army
8 directly connected with the Kwantung Army, it was
9 increasing its strength.

10 Q How much?

11 A Well, from 40,000 in 1941 it increased to
12 about 70,000 in 1943.

13 Q What preparations were made by the Mongolia
14 Stationary Army according to the Kantokuen to open hos-
15 tilities against the Soviet Union?

16 A Various preparations.

17 Q Name them.

18 A First, the conference of corps commanders.
19 Second, the suspension of release of soldiers who had
20 completed their term of duty. Third, the conversion
21 of cavalry into mechanized units. Fourth, the investi-
22 gation of the Feisuintaiku desert district on the spot.

23 Those are some of them.

24 Q Who were these corps commanders?

25 A The head of the army, Commander of the Army,

1 was Lieutenant General AMAKASU, Jutaro; the Commander
2 of the 26th Division, Lieutenant General SHIBAYAMA,
3 Kenshiro; Lieutenant General BABA, Seiro, Commander
4 of the Cavalry Units; Major General MANO, Goro, Com-
5 mander of the Second Independent Mixed Brigade.

6 Q When was that meeting?

7 A Around the 5th of July, 1941.

8 Q Only one such meeting during the time you
9 served in the Mongolia Occupation Army?

10 A There were conferences held later also.

11 Q Give the dates.

12 A I don't remember the exact dates, but the
13 conferences were held on the whole about once a year.

14 Q How do you happen to remember the date of the
15 earlier one and not the dates of the later ones?

16 A Well, the first conference was held immediately
17 after the outbreak of the German-Soviet War, and it
18 left quite an impression on my mind. That is why I
19 still remember it.

20 Q Why do you call that the first one? Do you
21 mean one was not held in the year before?

22 A Of course, I believe there was.

23 Q Of course they were held every year. Does
24 that mean they were planning aggression against the
25 Soviet Union every year?

1 A No, that does not follow.

2 Q Have you told us now all that the Mongolia
3 Occupation Army did in the way of preparations accord-
4 ing the the Kantokuen?

5 A I can't understand the meaning of your question.
6 May I have it repeated?

7 Q The meaning of my question is, have you now
8 told to the Tribunal all of the things which you spoke
9 of in your affidavit as being preparations made by the
10 Mongolia Stationary Army according to the Kantokuen
11 Plan for attack against the U.S.S.R.?

12 COLONEL IVANOV: Your Honor, in reply to the
13 question asked by the defense counsel, the witness has
14 quite positively stated that the Kantokuen Plan had
15 no connection whatsoever with the measures taken by
16 the Japanese Army in Inner Mongolia. However, the
17 defense counsel, in formulating his question, is
18 persistently pointing out that the measures taken in
19 Inner Mongolia were conducted under the Kantokuen Plan.

20 I do not know whether such questions are
21 admissible in an international court, but in our Soviet
22 courts such questions are inadmissible, both with
23 regard to the examination of the accused and examina-
24 tion of the witnesses.

25 MR. BLAKENEY: I have been very careful to use

1 the exact words of the affidavit each time I have put
2 that question.

3 THE PRESIDENT: If there is any assumption
4 of facts, it is based on the affidavit?

5 MR. BLAKENEY: That is correct.

6 THE PRESIDENT: Objection overruled.

7 MR. BLAKENEY: And I might say that the wit-
8 ness seems to have no trouble in knowing what I am
9 talking about.

10 Q Do you remember my last question?

11 A Yes, I do.

12 Q Answer it.

13 A I knew that the strength of the Mongolia
14 Stationary Forces had been increased from July 1941
15 to December of the same year by the addition of 5,000
16 new troops. I also know that Staff Officer KOTANI,
17 of the Kwantung Army, came to our army in September,
18 1941, as liaison officer, which fact I didn't mention
19 yet here.

20 Q What was that?

21 A Which fact I haven't mentioned here yet.

22 THE MONITOR: I have failed to testify to
23 that effect.

24 Q Are those all the points, then?

25 A Yes.

1 Q Did the Kantokuen provide for the time of
2 the aggression against the U.S.S.R.?

3 A I don't believe the time of attack had been
4 decided on. I have heard nothing concerning this.

5 Q The Kantokuen, you say, was effective during
6 1942 and 1943. What do you mean by "effective"?

7 The last line on page 4.

8 A By the term "effective" I meant that the
9 Kantokuen Plan had been carried over to 1942 and 1943.

10 Q You mean that the same plan for aggression
11 contained in the Kantokuen of 1941 continued to be
12 the plan for aggression of 1942 and 1943?

13 A Yes.
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1 Q I am especially interested in these large-
2 scale maneuvers which were held in accordance with
3 the Kantokuen in Manchuria and Korea from August 1941
4 onwards. Will you tell me more about those maneuvers,
5 please?

6 A I do not have sufficient knowledge concerning
7 the maneuvers which were held after August 1943.

8 Q I didn't mean to say 1943; if I did it
9 was an error. After August 1941?

10 A It was in August of 1943 that I assumed my
11 post.

12 Q I understand that, but in your affidavit you
13 say: "According to the Kantokuen, large-scale maneuvers
14 were put into practice in Manchuria by the Kwantung
15 Army since August 1941. It was so also with the Korea
16 Army in Korea" (bottom of page 4). Now, I want to
17 know about those maneuvers.

18 A Before replying to your question I should
19 like to make a short explanation.

20 Q No, I think you had better give me your
21 answer and you can make your explanation some other
22 time. Tell us about the maneuvers.

23 A I do not know in detail about the maneuvers
24 which were carried on up to July 1943. I do know,
25 however, that in August 1943 a river-crossing operation

1 -- maneuvers in crossing rivers were conducted near
2 Tsitsihar. Furthermore, in the winter of 1943
3 operations to withstand the cold were carried on with
4 one division as a unit near Chamussu.

5 Q Of course, all those things you are talking
6 about now were all just ordinary, normal, routine,
7 annual maneuvers, weren't they?

8 A Of course, they were annual maneuvers, but I
9 believe that they were operations -- maneuvers carried
10 out in training, to train the troops for operations
11 under the Kantokuen after the various units of the
12 army had been reorganized under the Kantokuen plan.

13 Q Now, when you wrote in your affidavit that
14 large-scale maneuvers were put into practice in Manchu-
15 ria by the Kwantung Army since August 1941, did you
16 know what you meant or didn't you?

17 A Of course, I did know about it, but what I
18 have written in my affidavit here was the explanation
19 given to me by Major KOBAYASHI, Chief of the Code
20 Section, and I have written it down just as he
21 explained it to me. I believe that you will under-
22 stand that what I have written here is an explanation
23 of what Major KOBAYASHI explained to me. I don't
24 think that you understand that.

25 Q I will worry about my understanding now, and

1 you will just answer the questions, please. Did you
2 see any maneuvers in Manchuria at any time?

3 A Yes, I have.

4 Q When?

5 A The maneuver which I saw myself was in
6 August of 1943, the river-crossing operation near
7 Tsitsihar, which took place in August 1943.

8 Q What troops were engaged in that maneuver?

9 A I don't recall the number of the unit, but
10 I remember that it was composed -- the whole number
11 of troops was composed of three divisions, approx-
12 imately.

13 Q How many troops had been engaged in maneuvers
14 in the preceding year?

15 A I don't know.

16 Q Well, in short, do you know whether there
17 was anything unusual in the scale of these maneuvers
18 in August of 1943?

19 A It is as you say.

20 Q Of course, you never saw any maneuvers in
21 Korea, did you?

22 A No, I never have.

23 Q So what you know about these large-scale
24 maneuvers is what you were told by some captain --
25 no, he was a major -- some major, isn't it?

A Yes.

Q Did he tell you the details of the large-scale maneuvers held in Manchuria and Korea as the result of the Kantokuen plan from August 1941?

A He did not explain the details to me.

Q Now, the Kantokuen plan, I believe, provided for the Mongolia Occupation Army's advance into the Zabaikal or Transbaikal area as part of the war plan, didn't it?

A I heard of that from Captain HATTORI.

Q But was that provided in the Kantokuen plan of 1941.

A That I do not know.

Q At any rate, you never heard of it until you were gossiping with some captain in Tokyo in the middle of -- in 1944, did you?

A Captain HATTORI was in the Cipher Section of the Kwantung Army at the time of this Kantokuen plan.

Q That wasn't my question. Repeat the question to him.

A I heard of this from Captain HATTORI, but I heard of it in a conversation which I had direct with Captain HATTORI.

Q In Tokyo, in 1944?

A No, that is not so.

Q When was it?

1 A In the beginning of December 1943.

2 Q All right, December 1943, in Tokyo. That is
3 right?

4 A Yes.
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1 Q And, did this captain tell you at that time
2 that the plan for the advance of the Mongolian
3 Occupation Army into the Transbaikal area was part
4 of the Kantokuen plan?

5 A No, he didn't say it was part of the plan.

6 Q Well, what did he say about it?

7 A He told me that simultaneously with the
8 Kwantung Army's operations under -- commencement of
9 operations under the Kantokuen plan the Mongolian
10 Stationary Army would begin its advance to the
11 Baikal through the Republic of Outer Mongolia, that
12 that was the plan.

13 THE MONITOR: "It was scheduled, too."

14 Q At any rate, whatever the plan was you
15 never -- it was never known to you in 1941 when you
16 were with the Mongolian Army, was it?

17 A I didn't know anything about it then.

18 Q Do you know a man, SEJIMA, Ruizo, a lieuten-
19 ant colonel, who testified for the prosecution here
20 that he participated in the drawing up of army plans
21 for the Japanese general staff?

22 A Yes.

23 Q Do you know that he testified here that the
24 operations plans for 1941 included no advance into the
25 Transbaikal area?

1 COLONEL IVANOV: This is outside the scope
2 of the affidavit and the cross-examination. On this
3 ground the prosecution is objecting to this question.

4 THE RUSSIAN MONITOR: He said, "It is
5 immaterial and has no bearing upon the issues in this
6 case, and it is outside the scope of the examination
7 in chief," instead of "cross-examination."

8 MR. BLAKENEY: I think it has some bearing
9 on this witness' credibility.

10 THE PRESIDENT: It would be sufficient for
11 you to point out in your summation the view of the
12 other man, Major Blakeney. I think it is only a
13 waste of time asking these questions of these people
14 in this way. It is quite common enough to tell a
15 witness that another person has a different view
16 and does he accept that, but I do not think any
17 advantage is to be gained by trying it here.

18 Q Now, in June, 1941, you saw some orders
19 relating to the principles of preparations for
20 operations.

21 A Yes, I did.

22 Q Did you ever see the principles themselves?

23 A No.

24 Q Do you know the contents of those principles
25 of preparations for operations?

1 A No, I did not.

2 Q Didn't any of your captain friends tell you?

3 A They have.

4 Q Well, tell us.

5 A Major MANAI, Ichiro, who was then an intelligence officer attached to the intelligence section
6 of the army told me that the objective of the Mongolian
7 Stationary Army, in case of attack, would be Ulanbator
8 and Zabaikal.
9

10 THE MONITOR: "And the same army will
11 launch an offensive in that direction."

12 THE INTERPRETER: "Will assume an offensive
13 position."

14 A (Continuing) And that its mission was to cut
15 the Trans-Siberia Railway, and to make it difficult
16 for the Soviet Union to transport supplies to the
17 Far East.

18 Q Is that all he told you about it?

19 A That is all he told me.

20 Q And, he was a major in the intelligence
21 section?

22 A He was a captain.

23 Q But, in the intelligence section?

24 A Yes.

25 Q Of the Mongolian Occupation Army?

A Yes, of the Mongolian Stationary Army.

Q Well, was it customary in the Mongolian Occupation Army for intelligence officers to know about operations plans?

A I don't think you can call it usual.

Q Have you ever been an intelligence officer?

A No.

Q Have you ever been an operations officer?

A No.

Q There is some little distinction between the two functions, isn't there?

A Yes, of course.

Q Now, as stated in your affidavit, you think that those principles of preparations for operations had something to do with the preparation of a war against the U.S.S.R., don't you?

A Yes, that is what I say.

Q And, I understand by the explanation you gave, this is proved by a number of facts which you mentioned and which I wish to examine a little..

Now, first, there was the visit of Lieutenant Colonel KOTANI in September, 1941. He was an officer of the Kwantung Army staff, wasn't he?

A Yes.

Q But, he came to your Mongolian Occupation

1 Army for liaison purposes?

2 A Yes.

3 Q And, you you knew those facts by reason of
4 having deciphered the message announcing his impend-
5 ing arrival?

6 A Yes, as you say.

7 Q And, he did come, didn't he?

8 A Yes.

9 Q And, he had a meeting with the commander of
10 the Mongolian Army?

11 A Yes.

12 Q You, however, weren't present at the meeting?

13 A Of course not.

14 Q You didn't know what was said or talked
15 about at the meeting?

16 A Of course I didn't.

17 Q In fact, this time you weren't even told by
18 any captain what they talked about, were you?

19 A No.

20 Q But, you assume that it had to do with plans
21 for aggression against the U.S.S.R., don't you?

22 A I gained the impression from the war situ-
23 ation between Germany and Russia and also from the
24 general atmosphere then prevailing.

25 Q And, that is one of the facts from which you

1 drew the conclusion that the principles of preparation
2 for operations had to do with the commencement of
3 the war against the Soviet Union?

4 A One of the facts, not the actual commence-
5 ment of war however, but preparation for war.
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1 Q By the way, was that sort of liaison
2 mission from the Kwantung Army exceptional or
3 uncommon in the Mongolia Occupation Army?

4 A During my tenure of office it was unusual.

5 Q How often did it happen during your tenure
6 there?

7 A All I can recall is that one occasion.

8 Q Then, the next significant fact on which
9 you base this conclusion is that one of your
10 superiors told you to be sure to have your code
11 books ready for use in case of need. And as I
12 understand it, that was evidence to you that an
13 aggression was planned.

14 A That is so.

15 Q I take it that in case of a defensive
16 war against the Soviet Union you wouldn't have
17 needed code books, would you?

18 A What is your meaning?

19 Q I mean that you have said that the
20 preparation of code books is evidence to your mind
21 that aggression was planned, and I am asking you
22 if these code books would not have been needed
23 equally in the event of a defensive war with
24 the Soviet Union.
25

THE PRESIDENT: We know code books are

1 required in any war, defensive or offensive.

2 MR. BLAKENEY: Of course, I am not trying
3 to prove the facts, your Honor. I am trying to
4 prove the type of opinion that man formed and evidence
5 upon which he is willing to come in here and give
6 those opinions, and I think it only fair to say that
7 if a man comes in here to swear away a man's life
8 on this type of affidavit, it is due the defense
9 to be allowed to investigate the basis for his
10 statements, whether of fact or of opinion.

11 THE PRESIDENT: Yes, but what we are
12 concerned about, Mr. Blakeney, is to have the
13 questions of counsel confined to those that are
14 likely to be really helpful. I keep repeating that
15 because I know that is what my Colleagues are
16 looking for. We are all looking for that.

17 MR. BLAKENEY: I haven't the slightest
18 wish to offend, but I do want to point out that
19 when these affidavits are admitted containing
20 material of this sort, we cannot know what part of
21 it will be given weight and what part will not.

22 THE PRESIDENT: We do not want you to take
23 up time putting questions where comment would suffice,
24 and by comment I mean matter that could well be
25 referred to in summation. You are right in saying

1 that you don't know just what effect this witness'
2 evidence is going to be given by any Member of the
3 Tribunal. Nevertheless, I do feel that he is not
4 nearly as important as many who have given evidence
5 and who will be expected to give evidence. And yet
6 we are spending a lot of time on the cross-examination.
7 It is a matter of judgment, Major Blakeney, and all
8 I can say is what I have said now. I do not propose
9 to say any more about it.

10 MR. BLAKENEY: I do want your Honor to
11 know that I am not attempting anything like a fili-
12 buster, but these are the ~~three~~ witnesses whom the
13 Soviet prosecution have thought sufficiently
14 important to bring and we think them sufficiently
15 important to cross-examine thoroughly.

16 COLONEL IVANOV: Your Honor, I want to call
17 the attention of the Tribunal to the fact that Mr.
18 Blakeney in his line of questioning is artificially
19 dividing minor and major facts stated in his affidavit
20 into episodes -- into separate episodes. Devoting
21 most attention to the examination of minor facts, he
22 is trying to tie them up with the conclusions that
23 he is drawing himself with regard to the aggression
24 which Japan was preparing against the U.S.S.R. I
25 submit that to continue this line of questioning

1 would be a waste of time and if it is advisable
2 to continue this cross-examination, then it should
3 be done on the basis of the estimation of facts
4 stated by the witness in his affidavit, without
5 splitting them into minor episodes.

6 THE PRESIDENT: It is still a matter of
7 judgment; what is major and what is minor.

8 Yes, Major Blakeney, proceed with your
9 cross-examination.

10 BY MR. BLAKENEY (Continued):

11 Q Well, here is another captain, one TSUBOI,
12 who told you all about the exploration of the
13 Feisuantaku Desert. Was he an operations officer?

14 A No.

15 Q What was he?

16 A He was the commander of the research party.

17 Q Of the exploration party, that is?

18 A Yes.

19 Q Wasn't that expedition under the command
20 of an intelligence officer?

21 A Yes.

22 Q Well, now, how do you determine that an
23 expedition for gathering information or intelligence
24 was either for aggression or for defense?

25 A I gained that impression from army reports

1 received at the time -- on the situation of the
2 army.

3 Q Reports from whom?

4 THE MONITOR: Not "reports." That was
5 corrected to "the situation of the army."

6 Q Oh, I am sorry.

7 If an intelligence officer commanded the
8 party, would that suggest to you that the party had
9 any connection with operations plans then in existence?
10 I should have said that it necessarily had such a
11 connection.

12 A Since the commander of the party was a
13 staff officer of the army in charge of intelligence,
14 I believe he must have been connected with operations.

15 Q Didn't you tell us just a few minutes ago
16 that there was a considerable distinction between
17 intelligence and operations?

18 A Well, of course, as far as the actual
19 duties of the respective sections went, I suppose
20 there was a difference.

21 Q Well, at any rate, you are not suggesting,
22 are you, that this party of exploration committed
23 any attack on the Soviet Union?

24 A Of course, it is as you say.

25 THE PRESIDENT: We will adjourn until

1 half-past nine tomorrow morning.

2 (Whereupon, at 1600, an adjournment
3 was taken until Wednesday, 29 October 1947,
4 at 0930.)

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